

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

PETER LORA, et al

1:07 CV 2787

V.

JUDGE DAN AARON POLSTER

DEAN BOLAND

NOTICE OF DEPOSITION  
DUCES TECUM

Now comes Dean Boland and gives notice that he will be taking the following deposition:

1. Witness, Victoria Bloom.

Place: Offices of Dean Boland  
18123 Sloane Avenue  
Lakewood, Ohio 44107  
216-529-9371 phone  
Date: Friday, March 6, 2009  
Time: 1:00 P.M.

**DUCES TECUM:** Plaintiff Bloom is commanded to bring with her and produce for inspection the following:

1. All documents related to any claim on behalf of Lora or her minor ward whom is a plaintiff in this matter as to reputation damage resulting from defendant's alleged conduct.
2. All documents related to any claim on behalf of Lora or her minor ward whom is a plaintiff in this matter as to financial damage resulting from defendant's alleged conduct.
3. All documents related to any claim on behalf of Lora or her minor ward whom is a plaintiff in this matter as to psychological damage resulting from defendant's alleged conduct.
4. All documents related to any claim on behalf of Lora or her minor ward whom is a plaintiff in this matter as to physical damage resulting from defendant's alleged conduct.

Since Plaintiff is a party to this action, no subpoena will be issued. This

deposition is taken pursuant to Rule 30 of the Federal Rules of Civil Procedure, and will be continued from day to day until completed and may be used as evidence in the trial of this matter.

Respectfully submitted,

/s/ Dean Boland  
Dean Boland, Esq.  
18123 Sloane Avenue  
Lakewood, Ohio 44017  
dean@deanboland.com

### **Proof of Service**

A true and accurate copy this Notice of Deposition has been electronically served this 28th day of January, 2009 on all parties as a function of the electronic filing system:

/s/ Dean Boland  
DEAN BOLAND  
Supreme Court Reg. No. 0065693